

Jennie Saxe/R3/USEPA/US
04/08/2009 09:42 AM To
Joe Slayton/ESC/R3/USEPA/US@EPA
cc
Michelle Hoover/R3/USEPA/US@EPA, William Arguto/R3/USEPA/US@EPA
bcc

Subject
Re: Region 3 DRAFT 2009 Certificates Based on Appendix E (Message 1 of 3)

History:
This message has been replied to.

Joe -

Sorry it took me so long to get back to you - thanks for sharing this. It makes a lot of sense to use this format and I know it was a tremendous amount of work, but I think it's paid off. This looks really good.

Jennie

Joe Slayton/ESC/R3/USEPA/US
03/06/2009 05:09 PM
To
Jennie Saxe/R3/USEPA/US@EPA, George Rizzo/R3/USEPA/US@EPA, Wendy Gray/R3/USEPA/US@EPA, Anthony Meadows/R3/USEPA/US@EPA, Michelle Hoover/R3/USEPA/US@EPA, WandaF Johnson/R3/USEPA/US@EPA, William Arguto/R3/USEPA/US@EPA
cc

Subject
Region 3 DRAFT 2009 Certificates Based on Appendix E (Message 1 of 3)

What/Purpose/Goal: Over the years R3 has been asked to certify and/or "approve" PSLs for an ever growing number of analytes for drinking water analyses. To help refocus our limited resources we started a project to identify critical analytical areas for PSL SDWA certifications.

Background: In the Lab Certification Manual is an Appendix E. The appendix lists analytical capabilities deemed necessary (primacy related) for PSLs to achieve SDWA certifications or for which the State must have a commercial laboratory available to perform these analyses. Such labs have to be accredited under the National Environmental Lab Accreditation Program/The NELAC Institute or R3 EPA Certification Officers would need to certify such labs. For a number of reasons, the latter option has been deemed impractical. One major hurdle to our goal was to update Appendix E to match current CFR requirements as it had not been updated in many

years. With much help from Michelle Hoover and input from OGWDW (Judy Brisbin) this task was accomplished. That listing was shared with the PSL laboratory directors and with the State SDWA Program Managers. One of the decisions along the way was from Rick Rogers, prior to the job change, namely that this would be independent of monitoring waivers. For example, even though MD has a waiver for CN analyses they would need to either have their PSL certified for cyanide or a commercial lab available to perform such analyses. The rationale was to be prepared in case of an unforeseen emergency. The certificates for the commercial labs "filling the gaps" in the primacy requirement are to be forwarded to R3 (we have a file of them at Ft. Meade).

With the updated Appendix E, we were able to update the "presurvey package" used to gather information from the PSLs prior to on-site assessments. In one large section of the package the PSLs are provided with a listing of all CFR approved methods for a given analyte. Since there has been considerable CFR updates in this area over the last several years (inorganic, organic and radio chemistry as well as microbiology) this proved no small task especially since OGWDW has decided not to update the outdated methods listing in the Lab Cert. Manual. Also, using the Appendix E listing we have the Proficiency Testing Provider used by the R3 PSLs providing the summary data for the year in a specified order specified pre-defined format (specified analytes in a fixed set order) to help streamline summarizing and better documenting the PSL's performance. In addition, using the updated Appendix E listing we have prepared new DRAFT SDWA Certificates for the R3 PSLs (defined listing of analytes in a specified order). The current in place certificates (covering the period January 1, 2009 until Dec. 31, 2009) were issued at the end of December 2008. The idea is to roll this out to give all time to adjust prior to the next formal issuance of the certificates at the end of the year. PT tracking and on-site assessments and even interim certifications during 2009 would reflect this approach ("Appendix E").

Needed Input: I am sharing the DRAFT Appendix E based Certificates with the EPA State Program Managers so you can see the areas for which the R3 PSLs hold SDWA certification and areas that commercial lab support is needed. I am also sharing these DRAFTS with the R3 PSL Directors for their comments/input. We have also shared the Appendix E listing/presurvey form and certificate template with the other Regions (Lead EPA Certification Officers and Regional QA Managers).
[attachment "Appendix E2008_8_25_08JB.xls" deleted by Jennie Saxe/R3/USEPA/US] [attachment "Fina lPT Form_w FootN_1_05_09.xls" deleted by Jennie Saxe/R3/USEPA/US]

[attachment "SDWA Chem Presurvey_2_6_09 JS.doc" deleted by Jennie Saxe/R3/USEPA/US]